

November 25, 2013

Submitted by email to: Joshua.m.koontz@usace.army.mil Daniel.d.ward@usace.army.mil

RE: General Comments on the Draft Environmental Impact Statement St. Johns Bayou New Madrid Floodway Project (July 2013)

While the Missouri Coalition for the Environment could support a sensible and responsible flood reduction project in the St. Johns Bayou area that focuses primarily upon reducing flood risk and damages to towns, homes and infrastructure, we strongly oppose the project proposed for the New Madrid Floodway for the following general reasons:

- 1. Any new development or increased crop intensification will tend to make it harder to use the floodway in the likely event of future Mississippi River flooding. The Corps should be focusing their efforts in the floodway upon improving the means of utilizing the floodway in a less damaging and more benign manner. Events in 2011 demonstrated clearly how necessary and valuable the floodway is as a floodway.
- 2. The large majority of the proposed New Madrid project's benefits are derived from questionably calculated agricultural benefits. Water resources development projects should not be used to improve the bottom line for a small group of individual stakeholders.
- 3. These project benefits will accrue to a small group of stakeholders who will not provide any significant cost share to the project cost, requiring the U.S. taxpayers to cover almost the entire cost.
- 4. The closing of the levee near New Madrid will have significant negative environmental impacts upon species and their current habitat at and near the lower end of the floodway. Through their reviews of the project, both the Department of the Interior and the US Fish and Wildlife Service have indicated that it is physically impossible to properly mitigate for the expected losses.

Specific comments have been submitted on the project DEIS in conjunction with the National Wildlife Federation and other organizations.

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